

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE SQUIRRELS RESEARCH LABS LLC ET AL.,
Debtors

CASE No. 21-61491
JUDGE KENDIG
CHAPTER 11
SUBCHAPTER V

**LIMITED RESPONSE OF SUBCHAPTER V TRUSTEE TO MOTION OF DEBTOR FOR
ENTRY OF AN ORDER (I) ESTABLISHING PROCEDURES FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS ON
A MONTHLY BASIS AND (II) LIMITING SERVICE OF NOTICES OF HEARINGS ON
INTERIM APPLICATIONS FOR COMPENSATION**

Frederic P. Schwieg the Subchapter V trustee (“Trustee”) responds to Squirrels Research Labs LLC’s Motion of Debtor for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals on a Monthly Basis; and (II) Limiting Service of Notices of Hearings on Interim Applications for Compensation [Doc. 64] (the “Motion”).

The Motion and the proposed order state that it is “for compensating and reimbursing Court-approved professionals (the “Professionals”) on a monthly basis...” While the Motion may be intended to include the Trustee, the Trustee is appointed by the Office of the United States Trustee and not the Court. Therefore, the order should be revised to states that it applies to “professionals appointed in the case including the Subchapter V trustee (the “Professionals”).”

Respectfully submitted,
/s/ Frederic P. Schwieg

Frederic P. Schwieg (0030418)
Attorney at Law.
19885 Detroit Rd. #239
Rocky River OH 44116-3008
1 (440) 499-4506
fschwieg@schwieglaw.com
Subchapter V Trustee

CERTIFICATE OF SERVICE

I hereby certify on February 2, 2021 that a copy of the foregoing Response to Motion to Establish Interim payment procedures was served **electronically** Via the Court’s Electronic Case Filing System on these entities and

individuals who are listed on the Court's Electronic Mail Notice List::

Notice will be electronically mailed to the U.S. Trustee, and:

John C. Cannizzaro on behalf of Interested Party Instantiation LLC
John.Cannizzaro@icemiller.com, lauren.prohaska@icemiller.com

Christopher Paul Combest on behalf of Creditor Avnet, Inc.
christopher.combest@quarles.com

Jeannie Kim on behalf of Interested Party Instantiation LLC
JeKim@sheppardmullin.com, dgatmen@sheppardmullin.com

Marc Merklin on behalf of Debtor Squirrels Research Labs LLC
mmerklin@brouse.com, tpalcic@brouse.com;mmiller@brouse.com

Christopher Niekamp on behalf of Creditor Better PC, LLC
cniekamp@bdblaw.com

Paul J. Schumacher on behalf of Interested Party Ohio Power Company dba American Electric Power
pschumacher@dmclaw.com, tgross@dmclaw.com

Frederic P. Schwieg
fschwieg@schwieglaw.com

Julie K. Zurn on behalf of Debtor Squirrels Research Labs LLC
jzurn@brouse.com, tpalcic@brouse.com

Kate M. Bradley ust44 on behalf of U.S. Trustee United States Trustee
kate.m.bradley@usdoj.gov

/s/ Frederic P. Schwieg, Esq.

Frederic P. Schwieg (0030418)
Attorney at Law.
19885 Detroit Rd. #239
Rocky River OH 44116-3008
1 (440) 499-4506
fschwieg@schwieglaw.com
Subchapter V Trustee